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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

IN RE COLLEGE ATHLETE NIL  
LITIGATION

Case No. 4:20-cv-03919 CW

**DECLARATION OF TYMIR OLIVER IN  
SUPPORT OF PLAINTIFFS' MOTION FOR  
ATTORNEYS' FEES, REIMBURSEMENT  
OF LITIGATION EXPENSES, AND  
SERVICE AWARDS FOR CLASS  
REPRESENTATIVES**

Hrg. Date: April 7, 2025  
Time: 10:00 a.m.  
Judge: Hon. Claudia Wilken  
Courtroom: 2, 4th Floor

1 I, TYMIR OLIVER, declare as follows:

2 1. I am one of the named plaintiffs in the above-entitled action. I have personal  
3 knowledge of the facts stated in this declaration and, if called as a witness, I could and would testify  
4 competently to them. I submit this declaration in support of Plaintiffs' Motion for Attorneys' Fees,  
5 Reimbursement of Litigation Expenses, and Service Awards for Class Representatives.

6 2. I became involved in this case in or about June 2020. I was introduced to my counsel  
7 who explained the history of NCAA litigation and what my potential claims I have related to name,  
8 image and likeness issues while I attended university. After numerous discussions with my counsel I  
9 decided that it was important to pursue this Action to not only recover my own personal loses but  
10 more importantly to change the system so current and future college athletes would have name,  
11 image and likeness opportunities that I was not allowed to pursue.

12 3. I understood from the outset that participating in this lawsuit as a class representative  
13 would not provide a significant financial benefit to me. I knew that there was no guarantee I would  
14 personally receive any more from my involvement beyond what other class members may receive,  
15 and that I could receive nothing if my attorneys and I were unsuccessful in this litigation, in which  
16 case the time that I devoted to the case would not result in any financial recovery whatsoever.

17 4. From the inception of this case, I have actively and diligently performed my duty to  
18 assist counsel in prosecuting this case, investing significant time and effort to fulfill my role as a  
19 class representative. I have devoted a significant number of hours in connection with my  
20 representation of the class including, among other things:

- 21 • Working with Class Counsel in the investigation of my claims and plaintiffs' claims  
22 generally;
- 23 • Reviewing the initial complaint, as well as the subsequent consolidated and amended  
24 complaints filed by Plaintiffs' Counsel;
- 25 • Regularly communicating with my attorneys regarding the status and progress of the  
26 action, including in anticipation of status conferences with the Court, key motion  
27

1 practice, such as Defendants' motion to dismiss and Plaintiffs' motion for class  
2 certification;

- 3 • Reviewing important litigation briefs and Court orders;
- 4 • Preparing and sitting for my in-person deposition by Defendants' lawyers which  
5 lasted approximately 7.5 hours. Prior to the deposition, I met with Class Counsel both  
6 in person and via telephone and/or Zoom 6 times and spent approximately 20 hours in  
7 total preparing for the deposition. Following the deposition I reviewed the deposition  
8 transcript for errors;
- 9 • Working with counsel regarding discovery, including reviewing and responding to  
10 Defendants' interrogatories and searching for responsive documents and data in  
11 response to Defendants' requests for production;
- 12 • Submitting a detailed declaration in support of Plaintiffs' motion for class  
13 certification;
- 14 • Communicating with Class Counsel regarding the prospects of settlement, consulting  
15 with my attorneys throughout the settlement process to ensure the class will achieve a  
16 fair outcome, and reviewing and approving the settlement.

17 5. Throughout this litigation, I have had numerous conversations with counsel both in-  
18 person and over the phone, and have exchanged many emails about relevant facts, strategy, and case  
19 progress.

20 6. At the time this case was filed, I was pursuing a professional football career in the  
21 NFL. In serving as a named plaintiff in a lawsuit against the NCAA and Power Five conferences I  
22 recognized that I was taking on a risk, especially given their substantial power in and around  
23 athletics, including in professional sports.

24 7. I support final approval of the settlement agreement in this matter. I understand that  
25 the Court granted preliminary approval of it, and that the Court will hold a final approval hearing on  
26 April 27, 2025, per the current schedule. I am proud to have been a named plaintiff in this litigation  
27

1 that has achieved a significant recovery for the class and will greatly benefit former, current, and  
2 future college athletes. I am proud to have played such a meaningful role in this case.

3 I declare under penalty of perjury under the laws of the United States that the foregoing is  
4 true and correct.

5 Executed this 11th day of December, 2024.

6   
7 \_\_\_\_\_  
8 TYMIR OLIVER